

found that designating U.S. Cellular as an ETC is in the public interest. It need not be addressed again.

Commission rule 4 CSR 240-3.570(2)(A)5 requires an applicant for ETC designation to demonstrate that "the commission's grant of the applicant's request for ETC designation would be consistent with the public interest, convenience and necessity." The Commission has already found that designating U.S. Cellular as an ETC is in the public interest, but the STCG's brief suggests that because U.S. Cellular is already providing service without USF support, the Commission must consider whether ETC designation will result in any additional competition or increased benefits for customers in rural Missouri.⁵⁸

That section of the rule simply requires a consideration of the impact on the public interest of the granting of the applicant's request for designation as an ETC. It does not require any specific finding of additional competition or increased benefits. The Commission has previously found that U.S. Cellular has demonstrated that its request for ETC designation is consistent with the public interest. No further consideration is required.

Commission Rule 4 CSR 240-3.570(2)(A)10 requires an applicant for ETC designation to make a commitment to offer a local usage plan comparable to the local usage plan offered by the ILEC in the areas the applicant seeks to serve. The Commission has already addressed this issue as it relates to the affordability of the services, including Lifeline services offered by U.S. Cellular. However, the STCG points out that the wireline ILECs offer a local usage plan that allows a customer to make unlimited local calls for a flat monthly rate. Since U.S. Cellular does not offer such a plan, the STCG argues that its local

⁵⁸ January 31, 2007, Post Hearing Brief of the Small Telephone Company Group, page 22.

usage plan is not comparable to those offered by the ILEC and thus does not comply with the regulation.

As the Commission has previously found, many ILECs offer unlimited local calling, but only to a few exchanges. In contrast, U.S. Cellular offers a limited number of minutes of use for a fixed fee but allows a customer to make calls to locations in most of the country. Some customers will benefit from the plan offered by the ILECs while others will benefit from the plan offered by U.S. Cellular. The customers can choose for themselves which plan they prefer. The Commission's rule does not require a wireless provider to become a wireline provider and it does not require U.S. Cellular to offer the same local usage calling plan as that offered by the ILECs. The rule requires only that their local usage calling plans be comparable. The Commission finds that the local usage plan offered by U.S. Cellular is comparable to the local usage plan offered by the ILECs and complies with the Commission's regulation.

Commission rule 4 CSR 240-3.570(2)(A)3 requires an applicant for ETC designation to submit a two-year plan demonstrating that USF funding will be used to "improve coverage, service quality or capacity on a wire center-by-wire center basis throughout the Missouri service area for which the requesting carrier seeks ETC designation. . . ." Several parties contend that because U.S. Cellular's plan does not propose to "improve coverage, service quality or capacity" in every wire center in which it seeks ETC designation, it does not comply with the rule.

U.S. Cellular agrees that improved network coverage is needed in every wire center for which it seeks ETC status and intends to continue to use the support it receives to

improve coverage in additional areas.⁵⁹ The coverage maps that U.S. Cellular submitted as part of its application show many areas in Missouri in which it cannot currently provide service over its own facilities. The two-year plan that U.S. Cellular submitted along with its application would bring additional coverage to some of those areas but it does not eliminate the areas without coverage. U.S. Cellular's initial two-year plan is a start toward improving coverage, but it is only a start. Fortunately, additional two-year plans will follow because an ETC is required to annually seek recertification to continue to receive USF funding, and Commission rule 4 CSR 3.570(4)(B)1 requires that when seeking recertification, an applicant is required to submit an updated two-year improvement plan.

The amount of support that U.S. Cellular will receive from the USF could not conceivably allow it to completely build out its network to achieve that goal in just two years, and that result is not required by the Commission's rule. Neither does the rule require U.S. Cellular to provide a detailed plan about how it will ultimately complete the build out of its network. Too many facts are still unknown, and unknowable, to allow such a plan to be anything but fantasy and guesswork.

U.S. Cellular has committed to construct facilities to provide network coverage in every wire center within its Missouri service area that qualifies for high-cost support.⁶⁰ The company will explain precisely how it intends to accomplish that task in subsequent two-year plans that it will file for Commission approval each year when it seeks recertification to receive USF funding. That is all that is required by the Commission's rule, and that is all that the Commission will require of U.S. Cellular.

⁵⁹ Johnson Supplemental Surrebuttal, Ex. 26, page 4, lines 3-5.

⁶⁰ Transcript, page 643, lines 2-6.

Commission rule 4 CSR 240-3.570(2)(A)3A indicates that an initial two-year plan shall include "a detailed map of coverage area before and after improvements and in the case of CMRS providers, a map identifying existing tower site locations for CMRS cell towers." As a sub-issue to its challenge to the sufficiency of U.S. Cellular's two-year plan, CenturyTel argues that the coverage maps that U.S. Cellular submitted as part of its initial two-year plan are not sufficiently detailed.

As part of its two-year plan, U.S. Cellular submitted statewide maps showing its existing coverage and the areas that would receive improved coverage when additional cell towers are built under its plan.⁶¹ These maps provide a statewide overview and do not provide wire center-by-wire center details of the sort that are shown in the maps submitted by CenturyTel's witness Glenn H. Brown and the STCG's witness Robert Schoonmaker.

Certainly, the maps submitted by U.S. Cellular do not provide precise details about existing and expanded coverage on a wire center-by-wire center basis. But the rule does not require that level of detail. The purpose of the rule's map requirement is to provide the Commission and the Commission's Staff with the information they need to determine whether the two-year plan meets the other requirements of the rule. The witness for the Commission's Staff, Adam McKinnie, although he testified that U.S. Cellular's two-year plan is deficient in other respects, did not testify to any concern about the adequacy of the submitted maps. Furthermore, the Commission has found the maps submitted by U.S. Cellular to be sufficient for its review. On that basis, the Commission finds that the maps submitted by U.S. Cellular satisfy the requirements of its regulation.

⁶¹ August 11, 2006, Compliance Filing of U.S. Cellular, Appendices 4 and 5. See also, Johnson Supplemental Surrebuttal, Ex. 26, Attached Proprietary Exhibits A, B, and C.

As previously indicated, the Commission's Staff found that U.S. Cellular's two-year plan failed to comply with the Commission's rule in one respect. Commission Rule 4 CSR 240-3.570(2)(A)3D requires a two-year plan to include "the estimated amount of investment for each project that is funded by high-cost support." Staff is concerned that U.S. Cellular has presented only aggregated budgetary information for the projects it will build instead of specific estimated costs for each proposed project.⁶² Indeed, the estimated costs projected by U.S. Cellular simply contain a total amount of capital expenditures per year and a number of cell sites to be built in each year. U.S. Cellular does not attempt to break down the amount anticipated to be spent on each individual cell site.

Staff's interpretation of the regulation would require U.S. Cellular to offer a detailed estimate of the cost of constructing each individual cell tower site. Yet the costs associated with constructing each individual cell site can vary greatly, and cannot be known with any certainty until that site is completed.⁶³ The Commission does not interpret its regulation to require U.S. Cellular to use a crystal ball to make an estimate of the cost of cell sites that are likely still very early in the planning stages. After the individual cell sites are constructed, U.S. Cellular will be in a position to tell the Commission exactly how much it spent on each cell site as part of its annual recertification request. At that time Staff will be able to review actual numbers rather than mere guesses when it determines whether U.S. Cellular has properly spent the USF funds it receives. For that reason, the Commission interprets its regulation as allowing U.S. Cellular's two-year plan to include aggregate cost estimates for the construction of projects using USF funding.

⁶² McKinnie Supplemental Rebuttal, Ex. 29, page 8, lines 17-19.

⁶³ Johnson Supplemental Surrebuttal, Ex. 26, pages 14-15, lines 23-29, 1-4.

The Commission's regulation imposes various additional requirements on an applicant for designation as an ETC. The evidence presented indicates that U.S. Cellular has complied with those other requirements of the rule⁶⁴ and no party has presented any contrary evidence. As a result, those requirements will not be further addressed.

The Commission finds that U.S. Cellular has complied with all applicable requirements of the Commission's ETC rule.

May U.S. Cellular Use USF Support to Make Network Improvements in AT&T Missouri's Wire Centers?

AT&T Missouri raises the issue of whether U.S. Cellular can use USF high-cost support to make network improvements in areas in which AT&T Missouri is the ILEC. AT&T Missouri provides phone service in most of Missouri's large cities, including St. Louis and Springfield, urban areas that are within U.S. Cellular's Missouri service area. But AT&T Missouri also provides phone service in many Missouri wire centers that are undeniably rural in character. However, as of July 1, 2006, as a Tier I carrier, AT&T Missouri receives no federal USF support for any of its wire centers; neither rural nor urban.⁶⁵ Hence, by definition, all of AT&T Missouri's wire centers are considered to be non-high cost. That also means that U.S. Cellular cannot receive support for any customers it serves in an AT&T Missouri wire center.⁶⁶

Both Federal law⁶⁷ and the Commission's regulation⁶⁸ require that U.S. Cellular spend any USF support it receives for "the provision, maintenance and upgrading of

⁶⁴ McKinnie Supplemental Rebuttal, Ex. 29, pages 5-13.

⁶⁵ Stidham Supplemental Rebuttal, Ex. 32, page 5, lines 11-12.

⁶⁶ Transcript, page 682, lines 4-8.

⁶⁷ 47 U.S.C. §254(e).

⁶⁸ 4 CSR 240-3.0570(2)(A)2.

facilities and services for which the support is intended." All parties, including U.S. Cellular, agree that U.S. Cellular cannot use USF support to construct facilities in urban low-cost areas, such as St. Louis, because such spending would not be an "intended" use of the support. AT&T Missouri, however, contends that U.S. Cellular should also be precluded from spending USF funds to build any facility in any AT&T Missouri wire center, even if that wire center is entirely rural.

Under the FCC's rules, AT&T Missouri is not allowed to receive high-cost support to improve its facilities in those rural wire centers that are, in fact, if not in law, costly to serve. AT&T Missouri argues that allowing U.S. Cellular to spend the high-cost support dollars to build facilities in AT&T wire centers, which are defined by law as non high-cost wire centers, would place AT&T Missouri at a competitive disadvantage, and would violate the Telecommunications Act's principle of competitive neutrality.

AT&T Missouri's competitive neutrality argument must be rejected because U.S. Cellular will have an obligation to serve throughout its ETC service area, including AT&T Missouri's rural wire centers, regardless of whether it will be allowed to receive high-cost support for those customers. Those rural customers, who currently pay into the USF like all other phone customers, should not be denied the benefits of improved telecommunications service that the USF was intended to deliver.

In one sense, AT&T's argument is premature. The Commission does not need to finally decide in this application case the propriety of the details of U.S. Cellular's expenditures of USF support. That process will occur later, when the Commission examines those expenditures in detail during the annual recertification process. However, for the guidance of the parties, the Commission will state that, in its opinion, there is

nothing in federal or state law that would prevent U.S. Cellular from spending USF support in the rural wire centers served by AT&T Missouri.

Is Designating Multiple Wireless Carriers as ETCs in the Public Interest?

CenturyTel and the STCG point out that the Commission has previously granted ETC designation to two wireless carriers – Northwest Missouri Cellular Limited Partnership⁶⁹ and Missouri RSA No. 5 Partnership⁷⁰ – in portions of the service area for which U.S. Cellular seeks such designation. They contend that the Commission must now take the existence of these other wireless ETCs into consideration when it determines whether designating U.S. Cellular's as an ETC would be in the public interest.

The STCG argues that the existing wireless carriers have already brought the benefits of wireless service, including Lifeline wireless service, to the areas for which they have been designated as ETCs. Therefore, they contend that U.S. Cellular must show that it will bring incremental benefits to those areas for which there is already a wireless carrier with ETC status. Another side of that argument is presented by CenturyTel, which contends that designating multiple competitive ETCs could make it less likely that any carrier will be able to complete the construction of a network in the high-cost areas that are to be served under the USF plan.⁷¹

The Commission has previously found that consumers in rural areas will benefit from the increased availability of wireless telecommunications services. There is no reason to believe that those benefits would not be enhanced by the presence of more than one

⁶⁹ *In the Matter of Northwest Missouri Cellular Limited Partnership's Application for ETC Designation*, Case No. TO-2005-0466, Report and Order issued September 21, 2006.

⁷⁰ *In the Matter of Missouri RSA No. 5 Partnership's Application for ETC Designation*, Case No. TO-2006-0172, Report and Order issued September 21, 2006.

⁷¹ Brown Rebuttal, Ex. 11, pages 46-47.

wireless carrier. Increased competition is generally a good thing. That is particularly true for wireless service because it is offered in a competitive market with only limited regulation by the FCC. If that market is to function properly to protect consumers from high prices and poor service, there must be more than one service provider in the market. Designating more than one wireless carrier as an ETC in a market will enhance competition and therefore is in the public interest.

Redefinition of Rural Service Areas

U.S. Cellular's application asks the Commission to redefine portions of the study areas of several rural telephone companies that fall outside U.S. Cellular's FCC-licensed service area.⁷² The list of ILEC wire centers to be redefined is set forth in Exhibit F to U.S. Cellular's Application.

U.S. Cellular seeks redefinition of certain ILEC study areas because, under federal law, a competitive ETC must serve an entire rural ILEC service area, which is defined as its study area, in order to be eligible for support in any part of that area, unless the state and the FCC agree to redefine the ILEC service area.⁷³ Of course, the FCC is not a party to this case so it cannot agree to a redefinition in this case. However, this Commission can grant conditional ETC status for the areas to be redefined, to take effect automatically upon a grant of concurrence by the FCC.

A redefinition of certain ILEC study areas is necessary because wireless carriers and wireline ILECs are not licensed along identical boundary lines. The boundary lines of some

⁷² The Application lists the affected ILECs as: ALLTEL Missouri, Inc.; BPS Telephone Company; Chariton Valley Telephone Company; Craw-Kan Telephone Cooperative, Inc.; Le-Ru Telephone Company; Mid-Missouri Telephone Company; Spectra Communications Group, LLC; and United Telephone Company of Missouri d/b/a Sprint (now known as Embarq).

⁷³ 47 U.S.C. §214(e)(5) and 47 C.F.R. §54.207.

ILEC study areas cut across the boundary of U.S. Cellular's licensed service territory as established by the FCC. As a result, U.S. Cellular cannot provide service in the entire ILEC study area. To get around this problem, U.S. Cellular proposes that the Commission redefine, as a separate service area, each of the ILEC wire centers that are part of a large study area that crosses outside the area served by U.S. Cellular.

The FCC has indicated that a state commission must consider three factors in deciding to redefine an ILEC service area: (1) whether the proposal would result in cream skimming; (2) whether the ILEC would incur an undue administrative burden; and (3) whether the ILEC's status as a rural carrier would be affected. Cream skimming could result if a competitive ETC chose to serve only the low-cost portions of an ILEC's study area, while collecting support based on the cost of serving the entire study area, including high-cost areas. U.S. Cellular demonstrated that cream skimming would not be a problem in its proposed service area. No party challenged that assertion. Similarly, U.S. Cellular demonstrated that its proposed redefinition of the ILEC study areas would not cause any undue administrative burden on an ILEC, and that no ILEC's status as a rural carrier would be affected. No party challenged either assertion.

U.S. Cellular has justified the redefinition of ILEC study areas as proposed in its application. The Commission will grant conditional ETC status for the areas to be redefined, to take effect automatically upon a grant of concurrence by the FCC.

CONCLUSIONS OF LAW

The Missouri Public Service Commission has reached the following conclusions of law:

1. *In establishing the principles that are to govern the provision of universal service support, the United States Congress, in the Telecommunications Act of 1996, set out the following principle regarding access in rural and high cost areas:*

Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.⁷⁴

2. To help support that principle, Congress required that "only an eligible telecommunications carrier designated under section 214(e) of this title shall be eligible to receive specific Federal universal service support."⁷⁵ Congress also required that "[a] carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which support is intended."⁷⁶

3. Section 214(e)(2) of the Telecommunications Act gives authority to State commissions to designate a common carrier as an eligible telecommunications carrier for a service area designated by the State commission. More than one common carrier can be designated as an eligible carrier to serve a service area. Specifically, that section provides:

Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

⁷⁴ 47 U.S.C. §254(b)(3).

⁷⁵ 47 U.S.C. §254(e).

⁷⁶ *Id.*

4. Section 214(e)(1) of the Telecommunications Act requires that a designated eligible telecommunications carrier must, throughout the designated service area:

- (A) offer the services that are supported by Federal universal service support mechanisms ..., either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using media of general distribution.

5. By regulation, the Federal Communications Commission has required that an eligible telecommunications carrier must offer each of nine designated services in order to receive federal universal service support.⁷⁷ The following are the nine services that must be offered:

- (1) Voice grade access to the public switched network;
- (2) Local usage;
- (3) Dual tone multi-frequency signaling or its functional equivalent;
- (4) Single-party service or its functional equivalent;
- (5) Access to emergency services;
- (6) Access to operator services;
- (7) Access to interexchange service;
- (8) Access to directory assistance;
- (9) Toll limitation for qualifying low-income consumers.⁷⁸

6. A regulation of the Federal Communications Commission, 47 CFR §54.201(i) states:

A state commission shall not designate as an eligible telecommunications carrier a telecommunications carrier that offers the services supported by federal universal service support mechanisms exclusively through the resale of another carrier's services.

7. Section 253(b) of the Telecommunications Act provides as follows:

Nothing in this section shall affect the ability of a State to impose, on a competitively neutral basis and consistent with section 254, requirements necessary to preserve and advance universal service, protect the public

⁷⁷ 47 CFR 54.101(b).

⁷⁸ 47 CFR 54.101(a)(1)-(9).

safety and welfare, ensure the continued quality of telecommunications services, and *safeguard the rights of consumers.*

8. In recognition of its obligation under the Telecommunications Act to determine whether a telecommunications provider should be designated as an eligible telecommunications carrier, the Commission has promulgated a regulation, 4 CSR 240-3.570, to guide and govern that determination.

9. Commission Rule 4 CSR 240-3.570(2) provides as follows:

(A) Each request for ETC designation shall include:

1. Intended use of the high-cost support, including detailed descriptions of any construction plans with start and end dates, populations affected by construction plans, existing tower site locations for CMRS [commercial mobile radio service] cell towers, and estimated budget amounts;

2. A two (2)-year plan demonstrating, with specificity, that high-cost universal service support shall only be used for the provision, maintenance and upgrading of facilities and services for which the support is intended in the Missouri service area in which ETC designation was granted. ...

10. Commission Rule 4 CSR 240-3.570(2)(A) further provides as follows:

3. The two (2)-year plan shall include a demonstration that universal service support shall be used to improve coverage, service quality or capacity on a wire center-by-wire center basis throughout the Missouri service area for which the requesting carrier seeks ETC designation including;

A. A detailed map of coverage area before and after improvements and in the case of CMRS providers, a map identifying existing tower site locations for CMRS cell towers;

B. The specific geographic areas where improvements will be made;

C. The projected start date and completion date for each improvement;

D. The estimated amount of investment for each project that is funded by high-cost support;

E. The estimated population that will be served as a result of the improvements;

F. If an applicant believes that service improvements in a particular wire center are not needed, it must explain its basis for this determination and demonstrate how funding would otherwise be used to further the provision of supported services in that area; and

G. A statement as to how the proposed plans would *not otherwise occur absent the receipt of high-cost support and that such support will be used in addition to any expenses the ETC would normally incur*;

4. A demonstration of the carrier's ability to remain functional in emergency situations, including a demonstration that the carrier has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations;

5. A demonstration that the commission's grant of the applicant's request for ETC designation would be consistent with the public interest, convenience and necessity;

6. A commitment to advertise the availability of services and charges therefore using media of general distribution throughout the ETC service area;

7. A commitment to provide Lifeline and Link Up discounts consistent with 47 CFR 54.401 and 47 CFR 54.411. Each request for ETC designation shall include a commitment to publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service consistent with 47 CFR 54.405;

8. A statement that the carrier will satisfy consumer privacy protection standards as provided in 47 CFR 64 Subpart U and service quality standards as applicable;

9. A statement that the requesting carrier acknowledges it shall provide equal access pursuant to 4 CSR 240-32.100(3) and (4) if all other ETCs in that service area relinquish their designation pursuant to section 214(e) of the Telecommunications Act of 1996; and

10. A commitment to offer a local usage plan comparable to those offered by the incumbent local exchange carrier in the areas for which the carrier seeks designation. Such commitment shall include a commitment to provide Lifeline and Link Up discounts and Missouri Universal Service Fund (MoUSF) discounts pursuant to 4 CSR 240-31, if applicable, at rates, terms and conditions comparable to the Lifeline and Link Up offerings and MoUSF offerings of the incumbent local exchange carrier providing service in the ETC service area.

11. U.S. Cellular is a commercial mobile radio service (CMRS) provider as that term is used in 4 CSR 240-3.570.

DECISION

After applying the facts as it has found them to the applicable law, the Commission has reached the following decisions.

U.S. Cellular has met all requirements of federal and state law and may be designated as an eligible telecommunications carrier throughout its Missouri service area.

IT IS ORDERED THAT:

1. USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular, is designated as an Eligible Telecommunications Carrier for the wire centers listed in Exhibits C and D attached to its Application, and is designated as eligible to receive all available support from the federal Universal Service Fund, including support for rural, insular, and high-cost areas, and low-income customers. Exhibits C and D are attached to and incorporated in this order.

2. USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular, is designated as an Eligible Telecommunications Carrier for the wire centers listed in Exhibit F attached to its Application, and is designated as eligible to receive all available support from the federal Universal Service Fund, including support for rural, insular, and high-cost areas, and low-income customers. Exhibit F is attached to and incorporated in this order.

3. USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular's designation as an Eligible Telecommunications Carrier for the wire centers listed in Exhibit F attached to its Application is conditional upon the redefinition of those wire centers as permitted by 47 U.S.C. §214(e)(5) and 47 C.F.R. §54.207, with the designation to take effect automatically upon a grant of concurrence by the FCC.

4. USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular's designation as an Eligible Telecommunications Carrier for the wire centers listed in Exhibits C, D and F attached to its Application is conditioned upon it meeting a base line investment requirement of a two-year average of \$15 million per year in capital expenditures for

construction of cell sites in its Missouri market, excluding St. Louis and the Joplin area, in addition to any funding it receives from the federal Universal Service Fund. In addition, USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular's designation as an Eligible Telecommunications Carrier is conditioned upon it spending all funds received from the federal Universal Service Fund in rural areas of Missouri in a manner consistent with all requirements of federal and state law.

5. The wire centers listed in Exhibit F attached to USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular's Application are redefined as separate service areas as requested.

6. USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular, shall file with the Commission a copy of its petition to the Federal Communications Commission seeking concurrence in the redefinition of its service areas.

7. The Commission finds that USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular, has met the high-cost certification requirement and is entitled to begin receiving high-cost support as of the effective date of this order.

8. The Commission certifies to the Federal Communications Commission that USCOC of Greater Missouri, LLC, d/b/a U.S. Cellular, will use such high-cost support for its intended purpose.

9. A copy of this Report and Order shall be served upon the Federal Communications Commission and the Universal Service Administration Company.

10. *This Report and Order shall become effective on May 13, 2007.*

BY THE COMMISSION



Colleen M. Dale
Secretary

(S E A L)

Davis, Chm., and Gaw, C., concur;
Murray, C., concurs with concurring opinion attached;
Clayton, C., dissents with dissenting opinion to follow;
Appling, C., dissents;
and certify compliance with the provisions
of Section 536.080, RSMo 2000.

Dated at Jefferson City, Missouri,
on this 3rd day of May, 2007.

Exhibit C
Nonrural ILEC Wire Centers
For Immediate Designation

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CARRIER	EXNAME	COVERED
CenturyTel (Central)	ASHLAND	Yes
CenturyTel (Central)	AVA	Yes
CenturyTel (Central)	CENTRALIA	Yes
CenturyTel (Central)	CLARK	Yes
CenturyTel (Central)	COLUMBIA	Yes
CenturyTel (Central)	CRANE	Yes
CenturyTel (Central)	HALLSVILLE	Yes
CenturyTel (Central)	MANSFIELD	Yes
CenturyTel (Central)	ROCHEPORT	Yes
CenturyTel (Central)	STURGEON	Yes
CenturyTel (Southwest)	ALTON	Yes
CenturyTel (Southwest)	AUGUSTA	Yes
CenturyTel (Southwest)	BLAND	Yes
CenturyTel (Southwest)	BLUE EYE	Yes
CenturyTel (Southwest)	BOURBON	Yes
CenturyTel (Southwest)	BRADLEYVILLE	Yes
CenturyTel (Southwest)	BRANSON	Yes
CenturyTel (Southwest)	BRANSON WEST	Yes
CenturyTel (Southwest)	BUFFALO	Yes
CenturyTel (Southwest)	CAPE FAIR	Yes
CenturyTel (Southwest)	CASSVILLE	Yes
CenturyTel (Southwest)	CAULFIELD	Yes
CenturyTel (Southwest)	CEDAR CREEK	Yes
CenturyTel (Southwest)	CHAMMOIS	Yes
CenturyTel (Southwest)	CONWAY	Yes
CenturyTel (Southwest)	CROSS TIMBERS	Yes
CenturyTel (Southwest)	CUBA	Yes
CenturyTel (Southwest)	DARDENNE	Yes
CenturyTel (Southwest)	DEFIANCE	Yes
CenturyTel (Southwest)	DORA	Yes
CenturyTel (Southwest)	ELKLAND	Yes
CenturyTel (Southwest)	EXETER	Yes
CenturyTel (Southwest)	FOLEY	Yes
CenturyTel (Southwest)	FORDLAND	Yes
CenturyTel (Southwest)	FORISTELL	Yes
CenturyTel (Southwest)	FORSYTH	Yes
CenturyTel (Southwest)	GAINSVILLE	Yes
CenturyTel (Southwest)	GALENA	Yes
CenturyTel (Southwest)	HAWK POINT	Yes
CenturyTel (Southwest)	HERMITAGE	Yes
CenturyTel (Southwest)	HIGH HILL	Yes
CenturyTel (Southwest)	HIGHLANDVILLE	Yes
CenturyTel (Southwest)	HOLSTEIN	Yes
CenturyTel (Southwest)	HURLEY	Yes
CenturyTel (Southwest)	JAMESTOWN	Yes
CenturyTel (Southwest)	JENKINS	Yes
CenturyTel (Southwest)	JONESBURG	Yes
CenturyTel (Southwest)	KIMBERLING CITY	Yes
CenturyTel (Southwest)	KOSHKONONG	Yes

Exhibit C
Nonrural ILEC Wire Centers
For Immediate Designation

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CenturyTel (Southwest)	LEASBURG	Yes
CenturyTel (Southwest)	LOUISBURG	Yes
CenturyTel (Southwest)	MANO	Yes
CenturyTel (Southwest)	MARSHFIELD	Yes
CenturyTel (Southwest)	MARTHASVILLE	Yes
CenturyTel (Southwest)	MORRISON	Yes
CenturyTel (Southwest)	MOSCOW MILLS	Yes
CenturyTel (Southwest)	MT. STERLING	Yes
CenturyTel (Southwest)	NEW MELLE	Yes
CenturyTel (Southwest)	NIANGUA	Yes
CenturyTel (Southwest)	O'FALLON	Yes
CenturyTel (Southwest)	OLD MONROE	Yes
CenturyTel (Southwest)	OZARK	Yes
CenturyTel (Southwest)	PITTSBURG	Yes
CenturyTel (Southwest)	PORTEM	Yes
CenturyTel (Southwest)	PRAIRIE HOME	Yes
CenturyTel (Southwest)	PRESTON	Yes
CenturyTel (Southwest)	REEDS SPRING	Yes
CenturyTel (Southwest)	ROCKWAY BEACH	Yes
CenturyTel (Southwest)	SAFE	Yes
CenturyTel (Southwest)	SHELL KNOB	Yes
CenturyTel (Southwest)	SPARTA	Yes
CenturyTel (Southwest)	ST. JAMES	Yes
CenturyTel (Southwest)	ST. PETERS	Yes
CenturyTel (Southwest)	SUMMERSVILLE	Partially
CenturyTel (Southwest)	THAYER	Yes
CenturyTel (Southwest)	THEODOSIA	Yes
CenturyTel (Southwest)	THOMASVILLE	Yes
CenturyTel (Southwest)	TROY	Yes
CenturyTel (Southwest)	TRUXTON	Yes
CenturyTel (Southwest)	URBANA	Yes
CenturyTel (Southwest)	VICHY	Yes
CenturyTel (Southwest)	WARRENTON	Yes
CenturyTel (Southwest)	WASHBURN	Yes
CenturyTel (Southwest)	WASOLA	Yes
CenturyTel (Southwest)	WENTZVILLE	Yes
CenturyTel (Southwest)	WHEATLAND	Partially
CenturyTel (Southwest)	WINFIELD	Yes
CenturyTel (Southwest)	WOOLDRIDGE	Yes
CenturyTel (Southwest)	WRIGHT CITY	Yes
SBC Missouri	ADRIAN	No
SBC Missouri	ADVANCE	Yes
SBC Missouri	AGENCY	Yes
SBC Missouri	ANTONIA	Yes
SBC Missouri	ARCHIE	No
SBC Missouri	ARGYLE	Yes
SBC Missouri	ARMSTRONG	Yes
SBC Missouri	ASH GROVE	Yes
SBC Missouri	ATTCHISON	Partially
SBC Missouri	BEAUFORT	Yes

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SBC Missouri	BELL CITY	Yes
SBC Missouri	BENTON	Yes
SBC Missouri	BILLINGS	Yes
SBC Missouri	BISMARK	Yes
SBC Missouri	BLOOMFIELD	Yes
SBC Missouri	BLOOMSDALE	Yes
SBC Missouri	BLYTHEVILLE	Partially
SBC Missouri	BONNE TERRE	Yes
SBC Missouri	BOONVILLE	Yes
SBC Missouri	BOWLING GREEN	Yes
SBC Missouri	BROOKFIELD	Partially
SBC Missouri	CAMDENTON	Yes
SBC Missouri	CAMPBELL	Yes
SBC Missouri	CAPE GIRARDEAU	Yes
SBC Missouri	CARDWELL	Yes
SBC Missouri	CARL JCT	Yes
SBC Missouri	CARROLLTON	No
SBC Missouri	CARTHAGE	Yes
SBC Missouri	CARUTHERSVILLE	No
SBC Missouri	CEDAR HILL	Yes
SBC Missouri	CENTER	Yes
SBC Missouri	CHAFFEE	Yes
SBC Missouri	CHARLESTON	Yes
SBC Missouri	CHESTERFIELD	Yes
SBC Missouri	CHILLICOTHE	No
SBC Missouri	CLARKSVILLE	Yes
SBC Missouri	CLEVER	Yes
SBC Missouri	CLIMAX SPRINGS	Yes
SBC Missouri	DEERING	Partially
SBC Missouri	DEKALB	Partially
SBC Missouri	DELTA	Yes
SBC Missouri	DESOTO	Yes
SBC Missouri	DEXTER	Yes
SBC Missouri	DOWNING	Yes
SBC Missouri	EAST PRAIRIE	Yes
SBC Missouri	EDINA	Yes
SBC Missouri	ELDON	Yes
SBC Missouri	ELSBERRY	Partially
SBC Missouri	ESSEX	Yes
SBC Missouri	EUREKA	Yes
SBC Missouri	EXCELSIOR SPRINGS	No
SBC Missouri	FARLEY	No
SBC Missouri	FARMINGTON	Yes
SBC Missouri	FAYETTE	Yes
SBC Missouri	FENTON	Yes
SBC Missouri	FESTUS	Yes
SBC Missouri	FISK	Yes
SBC Missouri	FLAT RIVER	Yes
SBC Missouri	FRANKFORD	Yes
SBC Missouri	FREDERICKTOWN	Yes

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SBC Missouri	FREEBURG	Yes
<i>SBC Missouri</i>	FROHNA	Partially
SBC Missouri	FT. SCOTT	No
SBC Missouri	FULTON	Yes
SBC Missouri	GIDEON	Partially
SBC Missouri	GLASGOW	Yes
SBC Missouri	GRAIN VALLEY	No
SBC Missouri	GRAVOIS MILLS	Yes
SBC Missouri	GRAY SUMMIT	Yes
SBC Missouri	GREENWOOD	No
SBC Missouri	HANNIBAL	Yes
SBC Missouri	HARVESTER	Yes
SBC Missouri	HAYTI	No
SBC Missouri	HIGBEE	Yes
SBC Missouri	HIGH RIDGE	Yes
SBC Missouri	HILLSBORD	Yes
SBC Missouri	HOLCOMB	Yes
SBC Missouri	HORNERSVILLE	Partially
SBC Missouri	IMPERIAL	Yes
SBC Missouri	JACKSON	Yes
SBC Missouri	JASPER	Yes
SBC Missouri	JOPLIN	Yes
SBC Missouri	KANSAS CITY	No
SBC Missouri	KANSAS CITY	No
SBC Missouri	KENNETT	Partially
SBC Missouri	KIRKSVILLE	Yes
SBC Missouri	KNOB NOSTER	Partially
SBC Missouri	LAKE OZARK	Yes
SBC Missouri	LAMAR	No
SBC Missouri	LAMONTE	Yes
SBC Missouri	LANCASTER	Yes
SBC Missouri	LEADWOOD	Yes
SBC Missouri	LEAVENWORTH	No
SBC Missouri	LILBOURN	Yes
SBC Missouri	LINN	Yes
SBC Missouri	LOCKWOOD	Yes
SBC Missouri	LOUISIANA	Yes
SBC Missouri	MACK'S CREEK	Yes
SBC Missouri	MALDEN	Yes
SBC Missouri	MANCHESTER	Yes
SBC Missouri	MARBLE HILL	Yes
SBC Missouri	MARCELINE	Yes
SBC Missouri	MARIONVILLE	Yes
SBC Missouri	MARSHALL	No
SBC Missouri	MARSTON	Yes
SBC Missouri	MAXVILLE	Yes
SBC Missouri	META	Yes
SBC Missouri	MEXICO	Yes
SBC Missouri	MOBERLY	Yes
SBC Missouri	MONETT	Yes

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SBC Missouri	MONTGOMERY CITY	Yes
<i>SBC Missouri</i>	MORE HOUSE	Yes
SBC Missouri	NEOSHD	Yes
SBC Missouri	NEVADA	No
SBC Missouri	NEW FRANKLIN	Yes
SBC Missouri	NEW MADRID	Partially
SBC Missouri	OAK RIDGE	Yes
SBC Missouri	OLD APPLETON	Yes
SBC Missouri	ORAN	Yes
SBC Missouri	PACIFIC	Yes
SBC Missouri	PATTON	Yes
SBC Missouri	PAYNESVILLE	Partially
SBC Missouri	PERRYVILLE	Yes
SBC Missouri	PEVELY	Yes
SBC Missouri	PIERCE CITY	Yes
SBC Missouri	PITTSBURG	Yes
SBC Missouri	POCAHONTAS	Yes
SBC Missouri	POND	Yes
SBC Missouri	POPLAR BLUFF	Yes
SBC Missouri	PORTAGE DE SIOUX	Yes
SBC Missouri	PORTAGEVILLE	Partially
SBC Missouri	PUXICO	Yes
SBC Missouri	QULIN	Yes
SBC Missouri	RICHMOND	No
SBC Missouri	RICHWOODS	Yes
SBC Missouri	RISCO	Yes
SBC Missouri	RUSHVILLE	Partially
SBC Missouri	SANANTONIO	Partially
SBC Missouri	SCOTT CITY	Yes
SBC Missouri	SEDALIA	Yes
SBC Missouri	SENATH	Yes
SBC Missouri	SIKESTON	Yes
SBC Missouri	SLATER	Partially
SBC Missouri	SMITHVILLE	No
SBC Missouri	SOUTH NIXA	Yes
SBC Missouri	SPRINGFIELD	Yes
SBC Missouri	ST. CHARLES	Yes
SBC Missouri	ST. CLAIR	Yes
SBC Missouri	ST. GENEVIEVE	Yes
SBC Missouri	ST. JOSEPH	Yes
SBC Missouri	ST. LOUIS	Yes
SBC Missouri	ST. MARY'S	Partially
SBC Missouri	STANBERRY	Yes
SBC Missouri	TRENTON	No
SBC Missouri	TUSCUMBIA	Yes
SBC Missouri	UNION	Yes
SBC Missouri	VALLEY PARK	Yes
SBC Missouri	VERSAILLES	Yes
SBC Missouri	VIENNA	Yes
SBC Missouri	WALNUT GROVE	Yes

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<i>SBC Missouri</i>	WARDELL	No
SBC Missouri	WARE	Yes
SBC Missouri	WASHINGTON	Yes
SBC Missouri	WEBB CITY	Yes
SBC Missouri	WELLSVILLE	Yes
SBC Missouri	WESTPHALIA	Yes
SBC Missouri	WYATT	Yes

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CARRIER	WIRE CENTER NAME
CenturyTel (Belle-Herman)	BELLE
CenturyTel (Belle-Herman)	HERMANN
CenturyTel (Southern)	CABOOL
CenturyTel (Southern)	MOUNTAIN VIEW
CenturyTel (Southern)	SEYMOUR
CenturyTel (Southern)	WEST PLAINS
CenturyTel (Southern)	WILLOW SPRINGS
Choctaw Telephone Co.	HALLTOWN
Ellington Telephone Co.	CLEARWATER LAKE
Ellington Telephone Co.	ELLINGTON
Ellington Telephone Co.	GARWOOD
Ellington Telephone Co.	REDFORD
Ellington Telephone Co.	SWEETWATER
Farber Telephone Co.	FARBER
Fidelity Telephone Co.	BERGER
Fidelity Telephone Co.	GERALD
Fidelity Telephone Co.	JAPAN
Fidelity Telephone Co.	LYON
Fidelity Telephone Co.	NEW HAVEN
Fidelity Telephone Co.	OWENSVILLE
Fidelity Telephone Co.	SPRING BLUFF
Fidelity Telephone Co.	STANTON
Fidelity Telephone Co.	SULLIVAN
Granby Telephone Co.	DIAMOND
Granby Telephone Co.	GRANBY
Holway Telephone Co.	MAITLAND
Holway Telephone Co.	SKIDMORE
Kingdom Telephone Co.	AUXVASSE
Kingdom Telephone Co.	BIG SPRING
Kingdom Telephone Co.	HATTON
Kingdom Telephone Co.	MOKANE
Kingdom Telephone Co.	RHINELAND
Kingdom Telephone Co.	TEBBETTS
Kingdom Telephone Co.	WILLIAMSBURG
Lamo Telephone Co.	BURLING TON JCT.
Lamo Telephone Co.	CLEARMONT
Lamo Telephone Co.	ELMO
Lamo Telephone Co.	WESTBORO
Mark Twain Rural Telephone Co.	BARING
Mark Twain Rural Telephone Co.	BETHEL
Mark Twain Rural Telephone Co.	BRASHEAR
Mark Twain Rural Telephone Co.	DURHAM
Mark Twain Rural Telephone Co.	GREEN TOP
Mark Twain Rural Telephone Co.	HURDLAND
Mark Twain Rural Telephone Co.	KNOX CITY
Mark Twain Rural Telephone Co.	LEONARD
Mark Twain Rural Telephone Co.	NEWARK
Mark Twain Rural Telephone Co.	NOVELTY
Mark Twain Rural Telephone Co.	PHILADELPHIA

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Mark Twain Rural Telephone Co.

STEFFENVILLE

Mark Twain Rural Telephone Co.

WILLIAMSTOWN

Mark Twain Rural Telephone Co.

WYACONA

Miller Telephone Co.

MILLER

New Florence Telephone Co.

NEW FLORENCE

New London Tel. Co./TDS Telecom

NEW LONDON

Northeast Missouri Rural Telephone Co.

ARBELA

Northeast Missouri Rural Telephone Co.

BROCK

Northeast Missouri Rural Telephone Co.

DMAHA

Northeast Missouri Rural Telephone Co.

GREEN CITY

Northeast Missouri Rural Telephone Co.

LEMONS

Northeast Missouri Rural Telephone Co.

LURAY

Northeast Missouri Rural Telephone Co.

MARTINS TOWN

Northeast Missouri Rural Telephone Co.

MEMPHIS

Northeast Missouri Rural Telephone Co.

NOVINGER

Northeast Missouri Rural Telephone Co.

POLLOCK

Northeast Missouri Rural Telephone Co.

QUEEN CITY

Northeast Missouri Rural Telephone Co.

TOBIN CREEK

Northeast Missouri Rural Telephone Co.

UNIONVILLE

Northeast Missouri Rural Telephone Co.

WINIGAN

Orchard Farm Tel. Co./TDS Telecom

DRCHARD FARM

Oregon Farmers Mutual Telephone Co.

OREGON

Peace Valley Telephone Co.

PEACE VALLEY

Rock Port Telephone Co.

ROCKPORT

Rock Port Telephone Co.

SOUTH HAMBURG

Rock Port Telephone Co.

WATSON

Seneca Telephone Co.

SENECA

Seneca Telephone Co.

TIFF CITY

Steelville Telephone Exchange, Inc.

CHERRYVILLE

Steelville Telephone Exchange, Inc.

HUZZAH

Steelville Telephone Exchange, Inc.

STEELVILLE

Steelville Telephone Exchange, Inc.

VIBURNUM

Stoutland Telephone Co./TDS Telecom

STOUTLAND